

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MONICA ALVAREZ ALFARO AND  
MARIA ISABEL ALFARO SALINA,

Plaintiffs,

v.

SABA LIVE POULTRY CORP. I,

Defendant.

Case No. 23-CV-1102 (RA)(KHP)

**MOTION FOR LEAVE TO APPEAR REMOTELY  
FOR THE MOTION HEARING SCHEDULED FOR MAY 2, 2024**

Plaintiffs attorney, Daniel I. Schlade from Justicia Laboral LLC, (“Attorney”) hereby files the following Motion for Leave to Appear Remotely over Zoom for the default judgement inquest on damages hearing scheduled for May 2, 2024 at 10:00 a.m., and states:

1. This case was filed on February 9, 2023, for unpaid wages under the Fair Labor Standards Act as well as violations of the New York Labor Law. Dckt. 1
2. Defendant was served and failed to answer, therefore default was entered and Plaintiffs moved for default judgment. Dckts. 9, 12 and 13
3. Judge Hon. Ronnie Abrams granted the default judgment against Defendant and referred this matter to Magistrate Judge Katharine H. Parker for an inquest on damages. Dckts. 22 and 23.
4. Per the scheduling order of January 17, 2024, Plaintiffs filed their memorandum of law for the damage’s inquest and the affidavit of attorneys’ fees and costs. Dckts. 26 and 27.

5. A Hearing regarding the damages application is set for May 2, 2024 at 10:00a.m., in New York. Dckt. 24

6. Counsel for Plaintiff is located in Chicago, Illinois. As such, Plaintiff would be required to travel by air.

7. In order to control legal fees and costs, the undersigned counsel respectfully requests leave to appear remotely for the hearing.

8. Plaintiffs' Counsel took these cases on a contingency fee basis and assumed the risk that they would receive no fee for their services (including in the event a default judgment is not collectible). Thus, this request is reasonable in light of the significant risks of nonpayment.

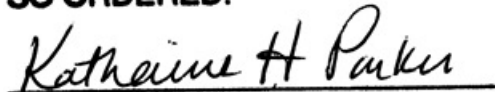
WHEREFORE, Plaintiff's counsel respectfully requests that this Motion be granted, and that he be granted leave to attend the May 2, 2024 hearing virtually.

**Plaintiff**

**s/Daniel I. Schlade**  
**Counsel For Plaintiff**  
**Justicia Laboral, LLC**  
**6232 N. Pulaski, #300**  
**Chicago, IL 60646**  
**773-550-3775**  
**dschlade@justicialaboral.com**

**Application granted.** The Inquest Hearing scheduled for **May 2, 2024 at 10:00 a.m.** is **converted to a remote conference to be conducted via Microsoft Teams**. The dial-in information for the conference is 646-453-4442, access code 136814892#. The Court will separately email counsel for Plaintiff a link to attend the conference by video. Plaintiff shall immediately serve upon Defendants a copy of this Order, as well as a print-out of the link to join the Teams conference, which will be emailed to Plaintiff's counsel.

**SO ORDERED:**



**HON. KATHARINE H. PARKER**  
**UNITED STATES MAGISTRATE JUDGE 4/16/2024**

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**CERTIFICATE OF SERVICE**

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I, Daniel I. Schlade, a member of the Bar of New York and a member of the bar of this court, certify that I served a copy of the MOTION FOR LEAVE TO APPEAR REMOTELY FOR THE MOTION HEARING SCHEDULED FOR MAY 2, 2024 by mailing copies to the parties of record at their listed addresses below, and depositing the same in the U.S. Mail via first class and certified mail in Chicago on **April 12, 2024**, with proper postage prepaid:

**Saba Live Poultry Corp. I**  
700 Grand Concourse  
Bronx, NY 10451

**Verification**

I declare under penalty of perjury that the foregoing is true and correct.

Executed: April 12, 2024

By: s/Daniel I. Schlade

Daniel I. Schlade, (Reg. No. 5916697)  
*Attorney for Plaintiff*  
Justicia Laboral, LLC  
6232 N. Pulaski, #300, Chicago, IL 60646  
Telephone: (773) 550-3775